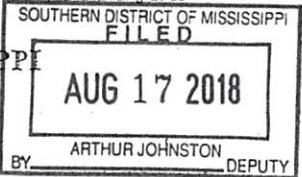


FORM TO BE USED BY PRISONERS IN FILING A COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

COMPLAINT

ANDERSON #56485
(Last Name) (Identification Number)

LEONUZEL
(First Name) (Middle Name)

Wilkinson County Correctional Facility (W.C.C.F.)
(Institution)
2999 Hwy. 61 - North
Woodville, Ms. 39166
(Address)
(Enter above the full name of the plaintiff, prisoner, and address
plaintiff in this action)

V.

CIVIL ACTION NUMBER:

5:18-cv-91-PCB-MTP

(to be completed by the Court)

Management Training Corporation,
SUED IN THEIR INDIVIDUAL CAPACITY

Jody Bradley (Warden)

Gabriel Walker (Warden of Security)

Pelicia Hall (Commissioner) of W.D.O.C.
(Enter above the full name of the defendant or defendants in this action)

**JURY TRIAL
REQUESTED**

OTHER LAWSUITS FILED BY PLAINTIFF

NOTICE AND WARNING:

The plaintiff must fully complete the following questions. Failure to do so may result in your case being dismissed.

- A. Have you ever filed any other lawsuits in a court of the United States? Yes (☒) No (☐)
- B. If your answer to A is yes, complete the following information for each and every civil action and appeal filed by you. (If there is more than one action, complete the following information for the additional actions on the reverse side of this page or additional sheets of paper.)
- Parties to the action: Anderson v. Glenn Hamilton, chairman, Shannon Warnock, Board member, Walter Tolbert, Board member, and Clarence E. Brown, Board member
(2.) Anderson v. Shannon Warnock (chairman), Emmitt L. Sparkman, Deputy Additional page →
 - Court (if federal court, name the district; if state court, name the county): (1) United States District Court Southern District - Jackson Division (2) United States District Court Eastern Division
 - Docket Number: (1) 3:07-CV-728 DPJ-JCS, (2) 4:10-CV-0128 (PA HTW), (3) 4:16 - Additional
 - Name of judge to whom case was assigned: (1) JAMES C. SUMNER, (2) Linda R. Anderson
 - Disposition (for example: was the case dismissed? If so, what grounds? Was it appealed? Is it still pending?): (1) WAS DISMISS NO APPEAL, (2) DISMISS, APPEAL WAS TAKEN - Additional →
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continue from page 1

Commissioner; BARTLEY Grimes - Deputy Warden; unknown Moore, Mental Health Counsel, unknown Smith, casemanager of Unit 5.

(3.) Mississippi Department of Correction, Norris Morris, Steven Pickett,

Clarence Brown, Earnest Lee, Timothy Morris, unknown Sturdivant,

Andrew Mills; unknown Cox; Kathryn McIntyre, Richard Pennington,

Dr. Angela Brown, Ricky Scott, Nola Nelson, unknown John Doe, (1)

C.I.D., unknown McCoy; unknown Burt; Charles Hall; Timothy Outlaw;

unknown Garrison; unknown Vance-MTC-; Gale Williams psych Dr.;

Pamela Robinson; unknown Johnson, unknown Mumford, unknown

Weeks; Marshall Fisher, unknown Alexander; Kay Washington, Parole

board supervisor; all are being sued in their official and individual capacity -

(2.) COURTS continue from page 1 : (3.) United States District Court Northern Division - Greenville, Miss.

(3.) DOCKET NUMBER : 4:16-cv-0101, DMB-JMV; NO. 17-60754

(4.) Name of Judge to whom case was assigned continue from page 1

- (3.) Debra M. Brown,

(5.) DISPOSITION : FIFTH CIRCUIT STATED THAT THE CASE IS (Moot!)

(3.) DISMISS, APPEAL IS PENDING RIGHT NOW; IN THE FIFTH CIRCUIT

COURT OF APPEALS; DISTRICT COURT JUST SEND ORDER DENY in -

forma pauperis; FIFTH CIRCUIT. STATE I MUST SEND A 'BRIEF' challenging the DISTRICT COURT RULING. July 2, 2018

PARTIES

(In item I below, place your name and prisoner number in the first blank and place your present address in the second blank. Do the same for additional plaintiff, if any).

I. Name of plaintiff: LEVONZEL ANDERSON Prisoner Number: #56485
 Address: Wilkinson County Correctional Facility (WCCF)
2999 Hwy. 61-North
Woodville, Ms. 39669

(In item II below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use the space below item II for the names, positions, and places of employment of any additional defendants.)

① II. Defendant: Management Training Corporation (M-T-C) is employed as
"HEADQUARTERS" at 500 N. MARKET
PLACE DRIVE ; CENTERVILLE, UT. 84014
is Being sued in their INDIVIDUAL CAPACITY

The plaintiff is responsible for providing the court the name and address of each plaintiff(s) as well as the name(s) and address(es) of each defendant(s). Therefore, the plaintiff is required to complete the portion below:

PLAINTIFF:

NAME: Levonzel Anderson ADDRESS: Wilkinson County Correctional Facility
#56485 - PROSE 2999 Hwy. 61-North
Woodville, Ms 39669

DEFENDANT(S):

NAME: 2.) Jody Bradley ADDRESS: Wilkinson County Correctional Facility
(Warden) being sued in 2999 Hwy. 61-North
his Official-Capacity Woodville, Ms. 39669
3.) Gabriel Walker Wilkinson County Correctional Facility
(Deputy-Warden) being 2999 Hwy. 61-North
sued in his official and Woodville, Ms. 39669
INDIVIDUAL

Continue From page 2

PARTIES

- | DEFENDANT(S)
NAME: | ADDRESS: |
|--|---|
| 4. <u>Tonya Toomey</u>
Warden of Programs, being -
sued in her official and individual capacity | Wilkinson County Correctional Facility
2999 Hwy. 61 - North
Woodville, Ms. 39669 |
| 5. <u>Larry Lee</u>
MDOC
Contract monitor
is being sued in his official and individual capacity | Wilkinson County Correctional Facility
2999 Hwy. 61 - North
Woodville, Ms 39669 |
| 6. <u>Unknown Taplan</u>
MDOC
Compliance/Officer is being sued in her official and individual capacity | Wilkinson County Correctional Facility
2999 Hwy. 61 - North
Woodville, Ms. 39669 |
| 7. <u>Pelicia Hall</u>
M.D.O.C.
Commissioner
Being sued in their official capacity | Mississippi Department of Correction
633 North State Street
Jackson, Ms. 39202 |
| 8. <u>Sean K. Smith</u> ,
MDOC
Correction Investigation Division
Being sued in his official and individual capacity | Mississippi Department of Correction
633 North State Street
Jackson, Ms. 39202 |
| 9. <u>Unknown Gale</u>
Psych. Counsel
being sued in his - official and individual capacity | Wilkinson County Correctional Facility
2999 Hwy. 61 - North
Woodville, Ms
Jackson, Ms. 39669 |
| 10. <u>Dr. Unknown Dunn</u>
Psych. Doctor, being sued in her official and individual capacity | Wilkinson County Correctional Facility
2999 Hwy. 61 - North
Woodville, Ms.
Jackson, Ms. 39669 |

continue from page 2

PARTIES

11. Unknown Turner Wilkinson County Correctional Facility
 (INVESTIGATOR)
 sued in his official and
 individual-capacity 2999 Hwy. 61 - North
 Woodville, Ms. 39669
12. Unknown Arbuthnot Wilkinson County Correctional Facility
 Casemanager Supervisor
 sued in his official and
 individual-capacity 2999 Hwy. 61 - North
 Woodville, Ms. 39669
13. Unknown Arrington Wilkinson County Correctional Facility
 Casemanager
 sued in his official and
 individual-capacity 2999 Hwy. 61 - North
 Woodville, Ms. 39669
14. Jane DOE Wilkinson County Correctional Facility
 2999 Hwy. 61 - North
 Woodville, Ms. 39669
15. JOHN DOE Wilkinson County Correctional Facility
 2999 Hwy. 61 - North
 Woodville, Ms. 39669

16.

GENERAL INFORMATION

- A. At the time of the incident complained of in this complaint, were you incarcerated because you had been convicted of a crime?
Yes (✓) No ()
- B. Are you presently incarcerated for a parole or probation violation?
Yes () No (✓)
- C. At the time of the incident complained of in this complaint, were you an inmate of the Mississippi Department of Corrections (MDOC)?
Yes () No ()
- D. Are you currently an inmate of the Mississippi Department of Corrections (MDOC)?
Yes (✓) No ()
- E. Have you completed the Administrative Remedy Program regarding the claims presented in this complaint?
Yes (✓) No (), if so, state the results of the procedure: attached to (17-18) pages

F. If you are not an inmate of the Mississippi Department of Corrections, answer the following questions:

1. Did you present the facts relating to your complaint to the administrative or grievance procedure in your institution?
Yes (✓) No ()
2. State how your claims were presented (written request, verbal request, request for forms): They where all writing with (grievances and notices) see Exhibits: BR-0 still haven't receive any ~~more~~ response for any of the officials →
3. State the date your claims were presented: _____
4. State the result of the procedure: P.R.E.A. violations, where supposed to be sent to Sean K. Smith (C.I.D.) M.D.A.C. HEADQUARTERS, only one response back from his assistance Mr. Zachary Houston, P.R.E.A. Coordinator (CID) after I file many complaint this the only was corresponded to . . .
Other 'they' state they can't do nothing about the problem, or its out of our hands. . . WCCC/MTC staff. see 17-18 pages

17. EXHAUSTION

Plaintiff has EXHAUSTED ALL AVAILABLE ADMINISTRATIVE REMEDIES REGARDING THE MATTER, described in this complaint or civil action on Jan. 22, 2018 date, plaintiff mailed his administrative remedy program here at the Wilkerson County Correction Center or Facility (WCCC) at the Legal Claims office, at several different dates see Exhibits: HT001-2. For the claiming the same incidents of 'Prison Rape Elimination Act of 2003' ~ Since plaintiff arrival on (March 22nd 2017) He been advised that all legal claims, were sent to the Mississippi Department of Correction (MDOC) at the Correction Investigation Division (C.I.D.) Unit - Sean K. Smith office, who never response but 'once', plaintiff on none of the (P.R.E.A of 2003) - violation that taken place with him. EXHIBIT: BR001 - BR008

18. Plaintiff further wrote the Warden of Programs Ms. Tierney, on Jan. 9, ~~2017~~²⁰¹⁸ date, who came in talk with me with the (invest.) Turner, on these continuing patterns of sexual assaults by these former 'Gang Members', with (NOTICE) given still nothing was gone about it left on the zone, as you can see plaintiff made "good faith efforted", to comply with the 'EXHAUSTION' requirement, but is still unable; to receive any relief.

Defendants still ignore the warnings left me here → on DELTA POD: For more sexual assaults / abuse to happen as if they are part taken in these assaults with the inmates or they in communication with these inmates??

STATEMENT OF CLAIM

- III. State here as briefly as possible the facts of your case. Describe how each defendant is involved. Also, include the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of different claims, number and set forth each claim in a separate paragraph. (Use as much space as you need; attach extra sheet if necessary.)

Anderson is subjective to Ongoing sexual abuse by State and Private Prison officials and gang members, in which these officials deny Anderson the right to be "PROTECTED FROM HARM," Equal Protection, Due Process of Law, Against ARBITRARY GOVERNMENT ACTUAL, A violation of the 1st, 5th, 6th, 8th and 14th Amendment of the United States Constitution.

Continue from page 17-73

RELIEF

- IV. State what relief you seek from the court. Make no legal arguments. Cite no cases or statutes.

(PRAYER FOR RELIEF)

Wherefore, plaintiff respectfully pray that this court enter judgment, Granting plaintiff Anderson, a declaration that the acts and Omissions described herein violate his rights under the Constitution and Laws of the United States; and -

Continue from page 60-71

Signed this 8th day of August, 2018

Levin Anderson #54185
2009 Hwy. 61 - North (WCCC)
Woodville, Ms. 39649

Signature of plaintiff, prisoner number and address of plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

August 8, 2018
(Date)

Levin Anderson
Signature of plaintiff

CONTINUE FROM EXHAUSTION

a the very zone, where all these sexual assault taken place 'DELTA' pool at Wilkinson County Correctional Facility (W.C.C.F.) ~ Protective Custody (P.C.)

17. Upon information and belief:

18. STATEMENT OF CLAIMS

Anderson is subjective to Ongoing sexual abuse by State and private prison officials and gang-members, in which these officials deny Anderson the right to be "Protected From Harm", Equal Protection, Due Process of law, Against arbitrary government actions; A violation of the 1st, 5th, 6th, 8th and 14th Amendment of the United States Constitution.

19. "Wilkinson County Correctional Facility or Center" is why?! The Correctional Investigation Division (CID) Lola Nelson, requested that Anderson, be sent by Transfer, to this prison on Protective Custody (PC) that hold sum '1400' inmates mostly 'C-custody' inmate; 'B-custody', sum (PC) Exhibit: 58cc(d),

20. On March 22, 2017, on Arrival Andersen told all available counsels, "That he's in fear of his life," do to - inmates are sexual attacking me in my sleep!" I can't be housed in a cell with another inmates. And that I need to be in a cell by myself! ~ All counsels stated "We don't have single cell," and you'll have to deal with it...

21. First Sexual Assault or Abuse on July 2, 2017, July 10, 2017. Andersen, had roommate (Raymond Pitts) who later sexual assaults him in his sleep! Then has another inmate to come in the cell while I'm in the shower 'punches' him in the eye, so he can leave out the cell "in fear" I'll do something to him. On July 10, 2017 date.

22. {Second sexual assault or abuse}
On 5/23/17 while in my cell, sleep of William - had allowed several inmates inside my cell 208, and who - did lords knows what!! While I was sleep I did a (ARP) on these 'sexual assaults', OVER the months, but its like they wasn't trying to hear my 'cry'. % Williams quit. see Exhibits: BR-042, 43, 44

23. Place sick calls in wrote Warden, but the attacks keeps on coming, so I notice something wasn't right! These peoples aint that crazy; its "something can waken me up in a dead sleep;" have me feeling 'drizzy' like I've taken medications and I know I haven't! I ~~was~~ feeling uncomfortable ways when I wake up. As if someone was "tempting with me while I was sleep."
24. This 'DEVICE' can tell when or what I'm thinking, they are running some kinda 'test', on me without my - permission, for consent. I wrote the Psych. Dept. for answer, and have to file grievances, on these staff and still couldn't receive the answer but, they keep on with the sexual harassment using these inmates on this pod see Exhibits: CA-006, BR-014, BR-016(a)(b) BR-025(A)(b)
25. EVEN writing the Warden of Programs, Ms. Toomey I still couldn't get, the harassment to stop. And she never believe me in the first place making statement with - 'Investigator Turner', that Andersen, is lying about the - allegations of being sexual assaulted in his sleep. Cause one should be able to feel such action while they are sleep! ~ And not one time did they get any [TEST-

done; to see if I was indeed telling the truth. see -
Exhibit: BRD19, BRD18A

26. Further, the two(2) told Andersen that he couldn't
 complaint about the 5th of February, 2018. He was told to
 pack up by the Wardens of Program T. Toomey, she never
 told me where; later the even, 'Lt Galsin' and a Sgt. come
 and took me to (Ad. Seg.) cell: 102, where I was verbally
 harassed all day and night inmates have the 'Dance', and -
 cell: 108, and the cell, echo's when you talk. The whole
 time being harassed there. So Andersen, calls the <P.R.E.A HOT-
 LINE>; and complained about the "verbal harassment" while
 being housed, Exhibit: BR-D18(a), BR-D20(a)(b),
27. When the two(2) came Warden Toomey, and the -
 (investigator) Turner, they came complaining about me, not
 being ~~able~~ able to use the (HOTLINE) verbally harassment -
 by saying "I couldn't state that I'm being verbally harassed
 and that it was for guys sexual conduct."
28. I stated "Verbally too!" - Warden Toomey, stated "IF I -
 call the <P.R.E.A./HOTLINE> Again. That shall write me,
 a Rule Violation Report (R.V.R.)"
29. (Investigator) Turner, stated "That IF I call again. He'll
 place me and 'General Population', Andersen stated "I -
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cain't scared of no damn! Purlation! "Take me now!"

Turner, ~~the~~ told the FLOOR OFFICER TO GET HIM SOME CUFFS!

She did. He open the door, put the cuff after taken my - shoes off. Push me up against the wall, took one my legs then took my shoes off. Got the other leg took the shoes off.

"WHY?" Exhibits: BR-107, BR-114, 12, 18(a), .

30. Put the shackles on, walk me out off the (Ad Seg) zone, right up the Hall in front of a Group of inmates, whos in red & white 'C-custody'. And Andersen, plaintiff-whos a 1.) Protective Custody inmate, 2.) he's a "black & white B-custody who don't suppose to be around each other from them get go. And to top it off none of them didn't have on any 'restraints' what's ever, which made it more better for the gang members to cause harm; if they chose.

31. Got me in the holding tank area, push me up against the wall, "Told me not to say another word", Got the keys, open the door, push me in. close it then left.

32. Later he takes me up the hallway, in my boxers in socks, to (H-J-K), To J-Pod cell 209 "Told the inmates if I call P.R.E.A / Again, that He'll let one of the guy come in my cell in "RAPE" me! I said "DON'T" →

let him get yaw' k---!" He left, see, Exhibit: BR-012, 18(c), This is Mr. Turner, 'second time,' he's threaten me, used profane laughs, being unprofessional.

Andersen, states "He no certin of whats going on with him. 'Upon information and belief:' Over the years dealing with gang members, or staff tempting with him at night or whenever they can drug him up!' and gose to sleep. . .

33. This "PROGRAM!" I call it, is a very serious 'deal', cause the inmate dont mine getting more time, losing their own lives, staff taken chances on losing their jobs or their lives, they are putting it on the line everyday in order for me to make the right move. so they maybe written down as they turn in my 'mind' whenever this (DEVICE) gose wrong on me. they'll need a inmate to put it back in its place this is why?! I must be in the room with a inmate at all time. so they'll brake the 'rules', in order for this to take place. see, Exhibit: BR-013(c),

34. Cause this been going on for (five) 5 year scine (2013) at Marshall County Correctional Facility (M.C.C.F.) this is where the (implant chip) was instored in. top of -

my anal, by "Private Doctors," who I want to their freeworld clinic to have the 'surgery' done; a black older man and a white older man who owns the clinic setting right off the highway. Both where medical doctors plus, they where 'homosexuals'; and they where the first ones to place this [monitor device inside me.] At <Holly-Springs, Ms.>

35. And to justify them violating my private area, they will not, put me in a cell by myself. To keep "gang members" from 'repeatedly' sexual assaults, or abuse me, to keep these device working, with the other inmates to make like its some type of 'homosexual game', to keep my mind through off of whats really going on. And they can never, go away, knowing these inmates are doing whatever it is, to me while I'm in a deep sleep! - see First Complaint: Andersen vs. Morris no 4:16cv101 DMB-JMV, and "all Exhibits" of this complaint.

36. Management Training Corporation, Mississippi
Department of Correction, are aware of
Anderson going through this "Intentional
Infliction of Emotional Distress", by these
State and Private Officials

37. Anderson, written all the mention staff, who listed inside this complaints, and they are aware of him being sexual assaulted by these inmate over and over, again. Who "Upon information and belief" - ~~That~~ he wrote the following (ARPs) NOTICES, LETTERS, That listed as Exhibits: HT001, 002, CA003, 004, 005, 006, BR 004, 007, BR1A, BR1B-19 etc.
38. How whenever I'm doing 'something' other than, what these inmates, have putting down with, they'll make their way to have other inmate to walk in my path, as I may be going to the (Microwave); or walk around the zone for exercise.
39. The (Gang Members) will have inmate to grab their privance whenever they in front or my present... This is a form of 'DISRESPECT' to make my mind get off the point of thinking of what it needs to be thinking! ~ Just recently July 2nd, 2018. When cell: 112, 111, 110, 109, 108, 107, came out together. Look at the inmates who walks in front of me, several times each time there was a (white guy) look at the top / tier - as well how the 'white guy' tried to rock me over, when walking by him. We were just let off a three (3) months "lock down".
40. And the 30th of June, 2018. Inmates had the <Monitoring Device> over, the cell I'm in now. Making like the can understand what's my mind thinking. Calling me names such as: Punks, GAYS, homos, I'm guessing they are trying to make 'react' or hellbent! Turn me into what they are? This Device also can 'wake' one out of a dead sleep! (under control) switch. Just
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to hear these inmate inflict verbal harassment, on me
 Imposing 'Psychological Trauma' "WAKING ME UP OUT OF
 MY SLEEP!" So this device, is the reason(s) I can't feel
 these inmate, going inside my anal. Due to them having control
 over my (mind and body).

41. Anderson AT NO TIME GAVE THE
 MANAGEMENT TRAINING CORPO-
 RATION (M-T-C), nor the STATE
 MISSISSIPPI DEPARTMENT OF -
 CORRECTION (M.D.O.C.) PERMISSION
 OR CONSENT, TO "RECORD, MONITORING
 MY ACTIONS, AND SEXUAL HARASSED"
 ANDERSON THROUGH ANY COURSE OF -
 THESE "PRISON RAPE ELIMINATION ACT-
 OF 2003" / violations

42. Anderson, never told the officials of State and Private
 that he will allow them to make the necessary steps or tests,
 to see if I'm intact been, sexual abuse, by state and private,
 officials and inmate who's playing the big part of this, who
 can let the staff of all he's writing, saying to give the
 staff officials the upper hand... Or try and correct the matter
 before I can write the 'courts, or and Media' concerning these -
 (sexual assaults) that ~~take~~ place with Anderson OVER YEARS!
 see, EXHIBIT: All Attached HT, CA, BR's
 page 18 of 28

43. Officials may call courts ahead of time, and state that Anderson is a 'mental patient'; And that they are running 'tests' on him to determine if his eligibility for parole release, but are indeed violating his 8th and 14th Amendment - rights under United States Constitution.

44. At "NO TIME", did And give these folk/staff member ~~no~~ anyone from the 'C.I.D. Sean K. Smith', M.D.D.C., ~~personnel~~ permission to run any test on me. On March 5, 2018. Dr. Dunn, call me in her office, at Wilkinsen County Correctional Facility (W.C.C.F.) ask me a few question then told me, what I have is call (Delusional) seeing, hearing things that's not there; she also had me sign for my new medications I ask Dr. Dunn, was I signing anything that ~~may~~ ^{might} hurt me? She stated "NAW" its just saying I gave you "Zyprexa and two (2) benzydriols" I did not sign for any program, to be played on me at no time!

45. On February 4th or 5th, 2018. I sign some more papers by Warden of Programs Tormay' who said I was signing papers said that my cellmate didn't rape ~~me~~ on that date. Another paper saying that I was seen by Medical and that I 'refuse' to be seen by medical personnel. Cause I wash all the evidence off of my body part. Just for that date (above) is the only papers I remember signing. Never a paper authorize any state or private official to run [RAPE test] on me... And they are doing (illegal testes) on me. Exhibits: _____

46. On March 5, 2018, I was call to the Clinic Psych. Dept. when I made it Dr. DUNN, was in the cell who I told of these sexual assaults, in my sleep! She said that Im have a mental state call <Delusional> that I see things thats really not their And that aint nothing really happen with me. Its all in my mind see,
Exhibits: BR-052, BR-054, BR-056D, BR56(?), BR-057(a)

47. "IF" its all in mind, why Im writing this - complaint; about being sexual abuse over the year! Im seeing inmates grabbing on themselves, calling me punk! Gay! homo! etc. And I wake up I be feeling 'drugged' as if some one was putting something in my ^{mouth or rect} And while I was sleep!

48. Andersen, states: why all these illegally acts are continue to happen? Warden of Security, Gabriel Walker hasn't said anything on the incident reports why haven't these inmates been written up a rule violation report (RVR) or even charge of that matter? Why, was I place back on the Pod these incident took place and not at another facility or in a cell by myself? So I can't accuse any one in the cell with me; if Im having [delusional] - thoughts?! Exhibit: BR-057(a)

49. Why the officers on the night shift are not checking in these cell like they are suppose to; or have a (flight light) for the cell that's to dark, and they can't see in?

a <Branch of Security>

50. CASEMANAGERS ARRINGTON & TOLLIVER Conspired
in keeping Anderson incarcerated over his -
time, by not given him all the parole papers
he'll need to sign, to have a fair parole hearing

The Casemanager here on 'C-D-E' section who will come around once a month Arrington who was the case worker when I come up for parole back in (January 11, 2017) didn't give me the papers to have; so I can send to the Newspapers for General Circulation, notice (2) two weeks; And I have a Murder charge according to §47-7-17 miss. code ann. In order - for the board to make their decision, on the inmate who's - serving a 'life-sentence' with parole. see Exhibit: BR-013(a), BR-016(a)(b), BR-028(a),

51. After the 'Board' denied Anderson's parole C-D-E had - a new case manager Tolliver, who refuse to give me the gold form decision of the parole. "Upon information and belief:" She waited weeks to give me this form, hoping that I would have went 'crazy' over the boards decision, of a one (1) year set off. Before she give me the 'gold copy', never the less Anderson, keep his cool. Ms. Tolliver, sent the gold copy to him at Administrative

Segregation (Ad. Seg.) where he was in a cell by himself. Couldn't no one do nothing to him why his sleep. And he - couldn't do nothing to anyone.

52. At All time the Warden Jody Bradley had (notice) of all incidents dealing with Anderson, but yet allow the inmates and staff at this facility to continue with the denial of - Protection From Harm[#] 20.05.01; with Larry Lee, Ms. Taplan the M.D.D.C. Compliance Officers; and the United States District Court Northern District Court, Greenville, Ms. Also had knowledge of the P.R.E.A. incident take place with me. At case no. 4:16cv 101 DUB-JMV, they're the first peoples to know of it. And it still gose on right! Today. Without any (Medical Health Care) provide even if I deny the treatment, There are still supposed to have give me, Examined '??'

53. DELIBERATE • INDIFFERENCE

54. Defendants) M.T.C, J. Bradley, G. Walker, T. Terney, L. Lee Taplan, P. Hall, S. K. Smith, Gale, Dr. Dunn, Turner, Arbutthnot, Arrington; had knowledge of This "Prison Rape Elimination Act of 2003", that is taken place with Anderson, at this Wilkerson County Correctional Facility or Center. While in cell: 208, Ad. Seg. 'J-Pod', Delta: 107, 207, 203, and 109, at no time was Anderson (medical evaluated), during these sexual abuse by inmates; over the years of the Ongoing P.R.E.A. violation of Anderson

And they fail to act reasonably or at all.

55. Defendant(s) J. Bradley, J. Abuttnoth, Arrington, Gale all knew of Anderson wanted to be in a cell by himself, so these attack wouldn't keep on occurring with him; as he sleep! Cause they are aware of the civil suit (~~Retaliation~~ ^{Retaliation}) Anderson have on the M.D.C. / Defendant(s) which one of them who sent me down here 'C.I.D. / P.R.E.A. / Coonated Lola Nelson, was aware of me not being able to be place in a {ONE MAN CELL} she still sent me down here anyways.

56. All (above) defendant(s) stated that their wasn't no single man cell, And that I was going to have a roommate; regardless of the situation. And Raymond Pitts ^(just one) where cellmates together where a former (AB) who now works for the gangs call themselves the (M.O.B.) That's why they place him in the cell with me and the first place. He later sexual assault Anderson, July 2nd 10th, left on 12th see Exhibits: BRID, 11, 2401, 30.

57. Defendant(s) M.T.C, J. Bradley, G. Walker, T. Toomey, L. Lee, Taplan, P. Hall; Had knowledge the 'GANGS', are the ones writing, calling, extorting my family and friends 'out of money', they will walk pass me and state "We can't, Get No Money, out of you - IF YOUR DEAD." So they are telling me, they are getting paid for this (Harassment) No one came to (investigated) me. To see if I'm lying telling the Truth! Inmate are waiting until I go to sleep! Get my mail; rewrite family scaring them, from sending me 'money'. But send it to their books / Accts instead (Rockefeller & Extortion) or else. "R.I.C.D. Act"

58. 'Mailroom' without any proof, will not send me the (backdate mail log) so I may see if they indeed mail my letter to my family with phone numbers to the Commissioner office, A.C.L.U., U.S. DEPT. OF JUSTICE, F.B.I. of Prisons, will its obvious they haven't gotten it; cause the Attacks are still happen right this day (July 7, 2018)

59. Defendants MTC, J. Bradley, G. Walker, T. Tierney, L. Lee, Taplan, P. Hall, S.K. Smith; had knowledge of all mention - incident describe in this complaint also. Anderson made sure he file Administrative Remedies office, here at Wilkinson County Correctional Center (WCCC) see, Exhibits: HT001-2, BRD14-18A, 20A-B, -21A, 24A-B, 25-A-B, 30, 35, 36, 49, 52; These violation where reported to all the (Above) Defendants but yet the problem still remain the same.

60. LEGAL CLAIMS

61. Defendants MTC, J. Bradley, G. Walker, T. Tierney, L. Lee, Taplan, P. Hall, S. K. Smith, Psych. Gale, Dr. Dunn, invest. Turner & Sgt. Arbutnot, Arrington; (intentionally) denied plaintiff Anderson his Right to be "Protected From Harm", #20.05.01, After telling the counsels in intake staff of my problem; that arose from Marshall County Correctional Facility (M.C.C.F.) and Mississippi State Penitentiary (M.S.P.) ~ Where plaintiff Anderson was being sexual harassed abuse, assaulted, by staff and inmates; at all three (3) facility These officials all took 'oath' to ensure no harm comes to any

offenders who's under their care. They are being sued for the violation of his 8th Amendment of the United States Constitution and caused Anderson pain, suffering, physical injury and Emotional Distress.

62. Defendants: MTC, J. Bradley, G. Walker, T. Toomey, L. Lee, Taplan, P. Hall, S. K. Smith, Psych Dr. Dunn, Gale, Turner, Arbutthnot, Arrington — Allowed and continued to Deprived plaintiff Anderson, of his right to be "Protected From Harm", when he arrived at - Wilkinson County Correctional Facility (WCCF) AFTER the months - went by continue to tell each defendant of the P.R.E.A. violation with the (R.I.C.O. Act) being throwed into the play. But the defendants still played along with Ongoing violation trying to stop plaintiff from pursuing with civil action against the (M.S.P.) defendants. A clear violation of His 5th, 8th, and 14th Amendment to the United States Constitution and Caused Plaintiff Pain, suffering, physical injury, and Emotional Distress.

63. Defendants: Bradley, Toomey, Gale, Dunn, Arbutthnot Arrington — Have direct knowledge that plaintiff Anderson was being violated of his rights. But they didn't do NOTHING! To stop it, slow it down, instead they edge it on, in it continue on right today! Shake offenders down then give their (contraband) back to the inmate who will have other inmates, to perform other sexual acts and record it by cell phone!! To send back to the corrupted officers and keep the other for themselves, to send around to (other inmates)

who will send it to my family for exchange for my 'life' for 'money';

64. Plaintiff Andersen, witnessing Defendants Torrey, Turner, Gale, - commit illegal actions, failing to correct that misconduct, and encouraging the continuation of the misconduct; of (Prison Rape Elimination Act of 2003) by calling me lies, pushing, cursing using all type of profanely laughs, threats not to call (P.R.E.A. Hotline) Also it NOTE the (MTC) Wilkinson County Correctional Facility has a new phone system and was in activity July 2, 2018 so far I haven't heard any introduction of a (PREA HOTLINE) or this (ETL) new phone service/company! I guessing we'll have to find this new HOTLINE on our own. "No medical treatment," when complaint about a (PREA VIOLATIONS.) Also they are violating plaintiff Andersen rights under the 'Eighth Amendment,' to the United States Constitution and causing Andersen, pain, suffering, physical injury and Emotional Distress.

65. Plaintiff Andersen, has NO-PAIN Adequate or complete Remedy at law to redress the wrongs described herein, Plaintiff has been and will continue to be irreparably injured by the conduct of the defendants unless this court grants the - Declaratory and Injunctive Relief which Plaintiff seeks.

66. PRAYER FOR RELIEF

67. WHEREFORE, plaintiff respectfully pray that this court enter judgment, Granting plaintiff Anderson, a declaration that the acts and omissions described herein violate his rights under the Constitution and laws of the United States; and
68. A Preliminary and Permanent injunction ordering defendants MTC, J. Bradley, G. Walker, T. Tenny, L. Lee, Tiplan, P. Hall, S. K. Smith, Arbutnot, Arrington, Turner, to cease and never allow it to happen to any other inmate, as long as Wilkinson County Correctional Center, is open for M.D.O.C. offenders; with the "Prison Rape Elimination Act"; any other physical violence and threats of general nature calling to Plaintiff cause he is a man; and other offenders after him. (2.) Make sure plaintiff is in a "cell by himself," due to him being a 'heavy sleeper', plus inmates be dragging plaintiff with 'sleeping medications' this has been happen for years officials need to stop! allowing prisoner to ^{take} advantage of us offenders with sleeping disorder or that takes psychological medications, stop having gang members to help with any wrong doing or violations of the (M.D.O.C.) policies, rules and regulations;
69. Granting plaintiff Anderson, 'compensatory damages' in the amount of \$100,000.00.
70. - Plaintiff seek 'punitive damages' in the amount of \$50,000.00. Plaintiff Anderson, seek these damages against each defendant(s) jointly and severally.

71. Plaintiff also seek recovery of their costs in this suit and Any additional relief this court deems just, proper, and equitable.

72.

Respectfully Submitted,

73. DATE: July 14, 2018

Levoncel Andersen

74.

VERIFICATION

75. I Levoncel Andersen, have read the foregoing complaint and hereby verify that the matters alleged therein are true except as to matters alleged on 'information and belief', and as to those, I believe them to be true. I certify under penalty of perjury that the foregoing is true and correct,

76. executed at Wilkinson County on July 14, 2018.

151 Levoncel Andersen
LEVONCEL ANDERSEN, PRO SE

THE UNITED STATES DISTRICT COURT

Leventel Anderson

plaintiff

vs.

Management Training
Corporation; et. al.

defendants)

Plaintiffs' List of Exhibits) --
and Notice, of Letters, to each
defendants) --

ALSO ENCLOSED ARE AFFIDAVITS: _____

CERTIFICATE OF SERVICE

I, Levoncel Andersen, #56485 - Do hereby certify that -
this day, cause to be mail via United States Postal from
the Wilkinson County Correctional Facility (WCCF)

From the Inmate Legal Assistance Program (ILAP) to the
following:

1. United States District Court
Office of the Clerk
501 E. Court Street
Suite 2,500
Jackson, Ms. 39201

4. U.S. Court of Appeals
600 S. Maeston Place
New Orleans, LA. 70130

2. Jim Hays
Attorney General
P.O. Box 220
Jackson, Ms. 39205

3. U.S. D.C.
911 Jackson Avenue
Suite 369
Oxford, Ms. 38655

This is the 15th day of August, 2018.

Levoncel Andersen
LEVONCEL ANDERSON
#56485 - W.C.C.C.
2999 Hwy. 61-North
Woodville, Ms. 39669

cc/pf.

DIC. 6308

LA./USDC.
MAG.
USDC (Jackson)